IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

TRUESIGHT COMMUNICATIONS LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-cv-00643-JRG

JURY TRIAL DEMANDED

CORRECTED UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO MOTION TO COMPEL

Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung" or "Defendants") move two-day extension to file a response to Plaintiff's Motion to Compel ("Motion"). (Dkt. No. 103.) This extension would move Samsung's response deadline from Monday May 26, 2025 to Wednesday, May 28, 2025. The parties met and conferred, and Plaintiff Truesight Communications, LLC ("Truesight," or "Plaintiff") does not oppose Samsung's request for an extension.

This Court has previously granted one extension of Samsung's deadline to file a response to Truesight's Motion. Samsung submits that good cause exists to move this deadline. On May 25, 2025, Samsung produced an additional set of licenses to Plaintiff and requested withdrawal of this Motion based on the production. On May 26, 2025, Plaintiff indicated that Plaintiff has not completed its review of the additional set of licenses and that Samsung's request for withdrawal is under consideration. The requested extension will not cause any delays to the progress of this case, and will instead give the Parties an opportunity to seek resolution of the issues presented in

Plaintiff's Motion.

Dated: May 28, 2025

/s/ Daniel S. Shimell

Jin-Suk Park

jin.park@arnoldporter.com

Nicholas M. Nyemah

nicholas.nyemah@arnoldporter.com

Arnold & Porter Kaye Scholer LLP

601 Massachusetts Ave., NW

Washington, DC 20001-3743

Telephone: (202) 942-5000 Facsimile: (202) 942-5555

Ryan M. Nishimoto

Ryan.nishimoto@arnoldporter.com

Nicholas H. Lee

nicholas.lee@arnoldporter.com

Daniel S. Shimell

daniel.shimell@arnoldporter.com

Douglas L. Clark

douglas.clark@arnoldporter.com

Arnold & Porter Kaye Scholer LLP

777 South Figueroa Street, 44th Floor

Los Angeles, CA 90017

Telephone: (213) 243-4000 Facsimile: (213) 243-4199

Melissa R. Smith

State Bar No. 24001351

GILLAM & SMITH, LLP

303 South Washington Avenue

Marshall, Texas 75670

Telephone: (903) 934-8450

Facsimile: (903) 934-9257

Email: melissa@gillamsmithlaw.com

Attorneys for Defendants Samsung Electronics Co., Ltd., and Samsung Electronics America,

Inc.

Respectfully Submitted,

/s/ Vincent J. Rubino, III

Alfred R. Fabricant

NY Bar No. 2219392

Email: ffabricant@fabricantllp.com

Peter Lambrianakos

NY Bar No. 2894392

Email: plambrianakos@fabricantllp.com

Vincent J. Rubino, III

NY Bar No. 4557435

Email: vrubino@fabricantllp.com

FABRICANT LLP

411 Theodore Fremd Avenue, Suite 206 South

Rye, New York 10580

Telephone: (212) 257-5797

Facsimile: (212) 257-5796

John Andrew Rubino

NY Bar No. 5020797

Email: jarubino@rubinoip.com

Michael Mondelli III

NY Bar No. 5805114

Email: mmondelli@rubinoip.com

RUBINO IP

51 J.F.K. Parkway

Short Hills, NJ, 07078

Telephone: (201) 341-9445

Facsimile: (973) 535-0921

Samuel F. Baxter

Texas State Bar No. 01938000

sbaxter@mckoolsmith.com

Jennifer L. Truelove

Texas State Bar No. 24012906

itruelove@mckoolsmith.com

MCKOOL SMITH, P.C.

104 E. Houston Street, Suite 300

Marshall, Texas 75670

Telephone: (903) 923-9000

Facsimile: (903) 923-9099

Attorneys for Plaintiff

Truesight Communications LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 28, 2025, a true and correct copy of the above and foregoing document has been served on all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

> /s/ Melissa R. Smith Melissa R. Smith

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that Plaintiff's and Defendants' counsel have met and conferred, and the Parties have agreed to the submission of this unopposed motion.

> /s/ Melissa R. Smith Melissa R. Smith